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Philip E. Culpepper
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March 31, 2017

VIA ELECTRONIC FILING

The Honorable Timothy J. Sullivan
United States Magistrate Judge
U.S. District Court for the District of Maryland
6500 Cherrywood Lane
Greenbelt, Maryland 20770

Re: *Drury v. Dziwanowski, et al.*
Civil No. MJG-15-3845

Dear Judge Sullivan:

I represent the Defendants in the above-captioned matter. I am writing in response to your correspondence to counsel dated March 31, 2017 regarding the settlement conference in the above captioned case. In your order, you require that the parties bring a person with "complete authority" to the May 31, 2017 settlement conference.

Please be advised that, pursuant to § 3-11-101 of the Anne Arundel County Code, there is established a "Self-Insurance Fund" the purpose of which is to "secure the liability of the county ... and its respective agents...." Pursuant to § 3-11-105 of the Code, there is established the "Self-Insurance Fund Committee," which consists of the Chief Administrative Officer, the County Attorney, the Central Services Officer, the Controller, a member of the Public Library Association, a member of the Anne Arundel Community College, and a member of the local Board of Education. The Committee reviews and approves all liability claims for payment in excess of \$10,000.00. Thus, there is no one individual with "complete authority."

This matter will be presented to the Committee at either its April 19, 2017 or May 17, 2017 meeting to obtain its authority to settle this case in an amount it may deem appropriate. This is in advance of the scheduled May 31, 2017 settlement conference.

For these reasons, I respectfully request that I be excused from bringing a person with complete authority and instead be permitted to bring the County's Risk Manager to the settlement conference. The Risk Manager administers all liability claims against the County.

Thank you for your consideration of this request.

Very truly yours,

A handwritten signature in black ink, appearing to read "Philip E. Culpepper", with a long, sweeping horizontal line extending to the right.

Philip E. Culpepper
Senior Assistant County Attorney

cc: counsel of record via electronic filing